IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

CHRISTINE WRIGHT n/k/a Christine Hamilton, as Special Administrator of the Estate of LISA SALGADO, Deceased,	
Plaintiff, vs.)) Case No.: 13-CV-315-JED-JFJ)
CORRECTIONAL HEALTHCARE COMPANIES, INC., and DELETTA WASHBURN, on behalf of the estate of PHILLIP WASHBURN, M.D., deceased,	
Defendants.	

PLAINTIFF'S FINAL WITNESS LIST

COMES NOW Plaintiff, Christine Wright n/k/a Christine Hamilton ("Plaintiff"), as the Special Administrator of the Estate of Lisa Salgado, deceased ("Ms. Salgado"), and respectfully submits the following Final Witness List:

■ Plaintiff's primary witnesses:

Name	Proposed Testimony
Christine Wright (n/k/a Hamilton)	Facts and circumstances relevant to the administration of the Estate and identification of documents. Damages.
Stanley Glanz	Policies, procedures, and practices in place at the Tulsa County Jail; facts and circumstances relevant to allegations contained in the Complaint.
Michelle Robinette	Facts and circumstances relevant to allegations contained in the Complaint. Policies,

	procedures, and practices in place at the Tulsa County Jail.
Billy McKelvey	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Phillip Washburn, MD	By Deposition. Physical condition of Ms. Salgado. Treatment provided to Ms. Salgado. Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Tammy Harrington	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Diane Maloy	Policies, procedures and practices of Defendants; systemic failures alleged and notice thereof; facts and circumstances relevant to allegations made in this lawsuit.
Scott Allen, M.D.	Expert Witness. See Report and Deposition.
Dipan Shah, M.D.	Expert Witness. See Report and Deposition. Shah will not testify regarding the nursing standard of care. See Doc. No. 567.
Chris Rogers, R.N.	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Sgt. Melissa Tapper	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer Matthew Tryon	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer Joshua Walker	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Eric Kitch	Facts and circumstances relevant to allegations contained in the Complaint. Policies,

	procedures, and practices in place at the Tulsa County Jail.
Detective Bobbie Harris	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Karen Metcalf	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Paul Wallace	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Mary Kate Hudson	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Josh Turley	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Rick Weigel	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Robert Walker	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.

■ Plaintiff's secondary witnesses:

Witness	Proposed Testimony
Officer "Ohnesorge"	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.

Officer "Snyder"	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer Steven Smith	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer Taressa Maybee	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Office of the Chief Medical Examiner	ME's Report
Dr. Micah Nix	Ms. Salgado's medical condition. Damages.
Dr. Amanda Green	Ms. Salgado's medical condition. Damages.
Tommy Nguyen, M.D.	Ms. Salgado's medical condition. Damages.
Michael Fogli, M.D.	Ms. Salgado's medical condition. Damages.
Bruce G. Carrico, M.D.	Ms. Salgado's medical condition. Damages.
Vickie S. Chain, DO	Ms. Salgado's medical condition. Damages.
Rebecca A. Bloom, M.D.	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Andy Adusei, MD	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Earnie Chappell	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.

Debra Cherry	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Amanda Bowman	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Faye Taylor	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Linsi Hastings	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Marchelle Brown-Suntken, LPN	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Patricia Benoit, LMFT	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Gerald Whitener, RN	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Charles Boyle	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Sharon Gammil	Facts and circumstances relevant to allegations contained in the Complaint. Policies,

	procedures, and practices in place at the Tulsa County Jail.
Cynthia Fairchild	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Karen Moon	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Eugene Bates	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Dena Spencer	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Monique Howard	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Amy Welker	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Janet Lance	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Theresa Vonfeldt	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.

Angela Alderman	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Tara Western, RN	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer "Ehrenrich" (TPD)	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer Dru Davis	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer Jared Gilbert	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer Jaylynna Moser	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
"Deputy Wortham"	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Officer "Bushyhead"	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Sgt. D. Hinshaw	Facts and circumstances relevant to allegations contained in the Complaint. Policies,

	procedures, and practices in place at the Tulsa County Jail.
Julie Hightower	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Shannon Moody	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Howard Roemer, M.D.	AMS Report and investigation.
Cal Kester	OSDH Investigations and Findings.
Don Garrison	OSDH Investigations and Findings.
Stephen Harnish, M.D.	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
John Bell, LPC	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Paul Branstetter	Homeland Security/ICE Audit and Findings.
Robert Greifinger, M.D.	Homeland Security/ICE Audit and Findings.
Dennis Hughes	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Bradley Payas	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Ewa Podlacha	Facts and circumstances relevant to allegations contained in the Complaint. Policies,

	procedures, and practices in place at the Tulsa County Jail.
Sheryl Stedham	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Brian Edwards	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Rob Lillard	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
John Bowman	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Pam Hoisington	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Linda Tucker	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Ronda Shaw	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Cherry Anjorin	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.

Dana Moses	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Kristy Peters	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Charles Wimberly	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Raymond Stiles	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Ron Peters	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
John Smaligo	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Steve Miller	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Charity Chumley, LPN	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Nicole Bynum, LPN	Facts and circumstances relevant to allegations contained in the Complaint. Policies,

	procedures, and practices in place at the Tulsa County Jail.
Lois Bell, DO	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Tulsa County Jail.
Any witness listed by a Defendant and not objected to by Plaintiff.	
Any witness needed to authenticate documents.	

Respectfully submitted,

s/Robert M. Blakemore
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of March 2021, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

s/Robert M. Blakemore